

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

3G LICENSING, S.A., KONINKLIJKE)
KPN N.V., and ORANGE S.A.,)
Plaintiffs,)
v.) C.A. No. 17-083-LPS-CJB
HTC CORPORATION and HTC)
AMERICA INC.,)
Defendants.)

**DEFENDANTS' MOTION TO DISMISS OR IN THE ALTERNATIVE TRANSFER
BASED ON IMPROPER VENUE AND CONVENIENCE**

Defendants HTC Corporation (“HTC Corp.”) and HTC America, Inc. (“HTC America”) (collectively “Defendants”) hereby move to dismiss for improper venue as to both defendants and for lack of personal jurisdiction as to HTC Corp.

Alternatively, defendants move to transfer to the Western District of Washington under 28 U.S.C. § 1406(a) and/or § 1404(a).

Pursuant to Local Rule 7.1.1, Defendants certify that a reasonable effort has been made to reach agreement with plaintiffs on the matters set forth in the motion.

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